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October 17, 2022

VIA CM/ECF

The Honorable Douglas E. Arpert, U.S.M.J.

United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 6W
Trenton, NJ 08608

Re: Young et al v. Mercedes-Benz USA, LLC et al., 3:22-cv-05502
Unopposed Request for Extension of Time to Respond to Complaint

Dear Judge Arpert:

This firm represents defendants Mercedes-Benz USA, LLC ("MBUSA") and Mercedes-Benz Group AG ("MBG") (collectively, "Defendants") in the above-referenced matter. Defendants respectfully write to request an extension of time to respond to the Complaint, up to and including January 17, 2023.

Plaintiffs, through counsel, consent to this request.

MBUSA was served with the Complaint on September 22, 2022, and on October 11, 2022, requested a 14-day extension of its time to respond, up to and including October 27, 2022, pursuant to Local Civil Rule 6.1(b) (ECF No. 8). MBUSA has not otherwise requested an extension of time to respond to the Complaint.

MBG has not yet been served, and therefore, does not have a deadline to respond to the Complaint. MBG has not previously requested an extension of time to respond to the Complaint.

There is good cause for Defendants' request. First, MBG is a non-US defendant and, in these circumstances, would be entitled to a 90-day period to respond to the Complaint under the Federal Rules of Civil Procedure. Accordingly, Defendants seek a commensurate extension until January 17, 2023. Second, the requested extension lines up both Defendants on the same timeline for responding to the Complaint. All parties agree that doing so would allow the litigation to proceed more efficiently than if Defendants briefed motions on separate tracks.

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010-9455-6008/1/AMERICAS

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Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Paul D. Erian

Paul D. Erian

SO ORDERED on this 18th day of October 2022,



DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

-this Order terminates ECF No. 11.